

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

KARL KENDALL, SUZANNE RAINEY
and VINCENZO PERNICE, individually and on
behalf of those similarly situated,

Plaintiffs,

v.

PHARMACEUTICAL PRODUCT
DEVELOPMENT, LLC, BOARD OF
DIRECTORS OF PHARMACEUTICAL
PRODUCT DEVELOPMENT, LLC, THE
BENEFITS ADMINISTRATIVE COMMITTEE,
and JOHN DOES 1-30.

Defendants.

Civil Action No. 7:20-cv-00071-D

**PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF CLASS ACTION SETTLEMENT, CERTIFICATION OF
SETTLEMENT CLASS, AND APPROVAL OF PLAN OF ALLOCATION**

Named Plaintiffs Karl Kendall, Suzanne Rainey, and Vincenzo Pernice (collectively, "Plaintiffs"), participants in the Pharmaceutical Product Development, LLC Retirement Savings Plan (the "Plan") hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting final approval to the class action settlement in this action on the terms of the Class Action Settlement Agreement ("Settlement Agreement"), fully executed on March 30, 2022 and previously filed with the Court on March 31, 2022 (ECF 46-1);
2. Certifying the Class as defined in the Settlement Agreement;
3. Appointing Named Plaintiffs as Class Representatives and Plaintiffs' Counsel as Class Counsel under FED. R. CIV. 23(g);
4. Finding that the manner in which the Settlement Class was notified of the Settlement was the best practicable under the circumstances and adequately informed the

Settlement Class members of the terms of the Settlement, how to lodge an objection and obtain additional information; and

5. For such other and further relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

- A. Memorandum in support of Plaintiffs' Final Approval of Class Action Settlement, Certification of Settlement Class, and Approval of Plan of Allocation; and
- B. Declarations of Plaintiffs' Counsel, the Named Plaintiffs, and Settlement/Notice Administrator.

Attached hereto is the proposed Final Approval Order and Judgment in the form agreed to by the parties and attached to the Settlement Agreement as an exhibit.

Dated: July 26, 2022

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh
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Counsel for Plaintiffs and
the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2022, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh
Mark K. Gyandoh, Esq.